



The countryside charity
Hertfordshire

31a Church Street
Welwyn
HERTS AL6 9LW
www.cpreherts.org.uk
office@cpreherts.org.uk
01438 717587

Standing up for Hertfordshire's countryside

Naomi Reynard
Planning and Building Control
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Herts SG6 3JF

Our Ref:

Your Ref:

25th March 2022 (by email)

Dear Naomi Reynard,

Application No. 19/01448/FP

**Residential development of 66 dwellings and associated new local open space,
access and associated works (as amended by plans and documents received
23rd December 2021 and 25th January 2022)
on former Wyevale Codicote Garden Centre, High Street, Codicote SG4 8XA**

I write with regard to above long-running application for residential development in the Green Belt, to which CPRE Hertfordshire continues to object for the following reasons.

1. The site is located in the London Metropolitan Green Belt as defined in the adopted North Herts Local Plan No. 2. according to criteria in the National Planning Policy Framework (NPPF). As such it may be regarded as inappropriate development and very special circumstances need to be demonstrated for development to be regarded as acceptable.
2. CPRE Hertfordshire objected to this application in July 2019, and our objections remain despite the amendments proposed by the developer, which may be regarded as essentially minor adjustments relating to design and related matters. These amendments do not affect the principle of inappropriate development in the Green Belt.
3. As noted previously, the Applicant's consultants, in the Planning Statement accompanying the application, state that "*The principle of development has been proven to be acceptable either when attributing weight to the emerging allocation and Green Belt release, or, crucially, through a 'very special circumstances case' which states that the site meets the criteria provided in Paragraph 145(g)(NPPF).*" There are also repeated references to the Council's inability to demonstrate a five-year housing land supply.
4. This is related by the consultants to the inclusion of the site as a potential development site (Site CD2) in the Submission Local Plan which is still currently subject

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President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

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to Examination in Public. The Inspector asked the Council to reconsider its proposed release of Green Belt land and his report has not yet been published.

5. Consequently, approval of this application would alter the Green Belt boundary in advance and Paragraph 136 of the NPPF is clear that amendments to Green Belt boundaries should be made through the Local Plan process, not by decisions made on individual planning applications. A decision to determine the application at this stage would thus pre-empt the findings of the Examination in Public and premature approval of this application could prejudice balanced decisions on the scale and location of housing in North Herts.
6. It remains our position that this proposal would cause significant harm to the openness of the Green Belt and constitutes a clear encroachment into open countryside. The delay in concluding the Examination in Public indicates the complexity of the issues raised and in any case circumstances have changed significantly since this application was made in 2019.
7. CPRE Hertfordshire raised issues at the Examination in Public regarding the impact of changing household formation projections on future housing need. It is contrary to the guidance of the NPPF, and the best professional practice, not to use the most up-to-date figures for new housing calculations.
8. Further, considerable changes have been made in associated legislation, namely the Environment Act 2021 and Climate Change Acts which should require a re-examination of the form and function of housing developments with regard to the impacts of climate change. Associated with these concerns are the increasing requirements to take full account of biodiversity net gain which necessitate a wholesale re-examination of how new housing is to be provided in the future.
9. For the above reasons, we urge the Council to refuse this application in its present form, and in line with many other local planning authorities with significant areas of designated protected Green Belt, institute a review of Local Plan policy proposals.

Yours sincerely,

Chris Berry
Planning Manager